

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

REMBRANDT 3D HOLDING LTD,

Plaintiff,

v.

**WILLIAM A. HOMONY, AS CHAPTER 11
TRUSTEE, *et al.*,**

Defendants.

Case No. 2:24-cv-6706-JMY

DECLARATION OF STEVEN M. COREN

I Steven M. Coren, state as follows:

1. I am over twenty-one years of age, and I am competent to give this declaration.
2. I am lead counsel representing the Trustee in the above-captioned matter.
3. I submit this declaration in support of the Joint Motion to Dismiss Complaint

being filed by the Trustee and Defendants SSG Advisors, LLC, J. Scott Victor, Teresa C. Kohl, Craig D. Warznak, Alexander D. Lamm, and Samuel P. Charlton.

4. The following documents attached hereto are true and correct copies of docket entries from *In re: Stream TV Networks, Inc., et al.*, E.D. Pa. Bankr. No. 23-10763:

Exhibit No.	Bankr. D.I. No.	Date	Description
1	548	1/5/2024	Trustee Opinion
2	630	5/6/2024	Motion Of William A. Homony in His Capacity as Chapter 11 Trustee for Entry of an Order Approving a Settlement Agreement and Mutual Release with Hawk Investment Holdings, Ltd., as Collateral Agent for the Secured Noteholders of Seecubic, Inc., Pursuant to Fed. R. Bankr. P. 9019(a) and 11 U.S.C. § 105(a)

Exhibit No.	Bankr. D.I. No.	Date	Description
3	643	5/20/2024	Rembrandt 3D Holding Ltd.'s Objection To Motion Of William A. Homony In His Capacity As Chapter 11 Trustee For Entry Of An Order Approving A Settlement Agreement And Mutual Release With Hawk Investment Holdings, Ltd., As Collateral Agent For The Secured Noteholders Of Seecubic, Inc., Pursuant To Fed. R. Bankr. P. 9019(A) And 11 U.S.C. § 105(A) [Exhibits thereto omitted]
4	653	6/6/2024	Order Approving Settlement Agreement
5	670	6/17/2024	Transcript of 6/5/2024 Hearing
6	741	9/20/2024	Order Granting Amended Application of the Chapter 11 Trustee to Employ SSG Advisors, LLC As Investment Banker
7	750	9/30/2024	Motion of William A. Homony in His Capacity as Chapter 11 Trustee for (i) an Order (A) Approving the Bidding Procedures and Form of Asset Purchase Agreement for the Sale of Substantially All of the Debtors' Assets, (B) Establishing the Notice Procedures and Approving the Form and Manner Of Notice thereof and Scheduling a Sale by Auction, (C) Approving Procedures for the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (D) Scheduling a Sale Hearing, (E) Granting Expedited Consideration Pursuant to Local Rule of Bankruptcy Procedure 5070-1(g), and (F) Granting Related Relief, and (ii) an Order (A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related thereto, and (C) Granting Related Relief
8	789	11/6/2024	Rembrandt 3D Holding Ltd.'s Objection to Motion of William A. Homony in His Capacity as Chapter 11 Trustee for (i) an Order (A) Approving the Bidding Procedures and Form of Asset Purchase Agreement for the Sale of Substantially All of the Debtors' Assets, (B) Establishing the Notice Procedures and Approving the Form and Manner Of Notice thereof and Scheduling a Sale by Auction, (C) Approving Procedures for the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (D) Scheduling a Sale Hearing, (E) Granting Expedited Consideration Pursuant to Local Rule of Bankruptcy Procedure 5070-1(g), and (F) Granting Related Relief, and (ii) an Order (A) Approving the

Exhibit No.	Bankr. D.I. No.	Date	Description
			Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related thereto, and (C) Granting Related Relief [Exhibits thereto omitted]
9	795	11/11/2024	Praecipe to Substitute Exhibit "B" to Motion of William A. Homony in His Capacity as Chapter 11 Trustee for (i) an Order (A) Approving the Bidding Procedures and Form of Asset Purchase Agreement for the Sale of Substantially All of the Debtors' Assets, (B) Establishing the Notice Procedures and Approving the Form and Manner Of Notice thereof and Scheduling a Sale by Auction, (C) Approving Procedures for the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (D) Scheduling a Sale Hearing, (E) Granting Expedited Consideration Pursuant to Local Rule of Bankruptcy Procedure 5070-1(g), and (F) Granting Related Relief, and (ii) an Order (A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related thereto, and (C) Granting Related Relief
10	807	11/18/2024	Transcript of 11/13/2024 Hearing
11	811	11/20/2024	Order (A) Approving Bidding Procedures And Form Of Asset Purchase Agreement In Connection With The Sale Of Substantially All Of The Debtors' Assets, (B) Approving Procedures For The Assumption And Assignment Of Executory Contracts And Unexpired Leases, (C) Approving Procedures For Selection Of A Stalking Horse Bidder And Bid Protections, And (D) Granting Related Relief
12	816	11/22/2024	Rembrandt 3D Holding Ltd.'s Objection to the Sale of Substantially All of the Debtor's Assets [Exhibits thereto omitted]
13	876	12/9/2024	Order (A) Approving The Sale Of Substantially All Of The Debtors' Assets Free And Clear Of All Liens, Claims, Encumbrances And Interests, (B) Authorizing The Trustee To Enter Into And Perform Debtors' Obligations Under The Asset Purchase Agreement, (C) Approving Assumption And

Exhibit No.	Bankr. D.I. No.	Date	Description
			Assignment Of Certain Executory Contracts And Unexpired Leases, And (D) Granting Related Relief
14	878	12/11/2024	Transcript of 12/4/2024 Hearing
15	916	1/8/2025	Opinion in support of Sale Order

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: April 4, 2025

/s/ Steven M. Coren
Steven M. Coren